

**COMMENTS ON THE PETITION FOR RULE-MAKING RM-10867
PROPOSED BY THE AMERICAN RADIO RELAY LEAGUE (ARRL)**

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Morse Code Requirement

The ARRL proposes to drop the Morse code proficiency requirement for the proposed new “Novice” class, and the Technician and General classes, but to keep a 5 word per minute requirement for Extra class. However, no clear regulatory purpose is served by privileging one mode of communication over another—keeping the Morse code requirement even for one license class.

§ Even a diluted Morse code requirement *obstructs progress* of the radio art and *diminishes the appeal* of the amateur radio service among service- and technically-oriented individuals

New Entry Level License

Creation of a “Novice” license, as proposed by the ARRL, is unnecessary. The existing Technician class license is adequate as an entry-level qualification.

§ The Technician class allows for experimentation with many modes of operation at different frequencies, focusing the attention of individuals on the more technical aspects of the amateur radio service, while facilitating their participation in public services activities.

Automatic Upgrading of Technicians to General Class

The ARRL proposes to automatically upgrade all existing Technician licensees to General class, without passing the Element 3 examination otherwise required for that license.

§ Automatic upgrading is contrary to one of the purposes of the amateur radio service as stated in 97.1(c) “*Encouragement and improvement of the amateur radio service through rules which provide for advancing skills in both the communications and technical phases of the art.*” The Element 3 examination should be maintained as a requirement for the General class. However, restricted HF privileges in phone and data segments of amateur bands could be granted to Technicians (including output power limitations).

Power Limit for Entry Level License in 10 Meter Band

The ARRL proposes a 50 Watt power limit for entry level licensees in the 10 meter band.

§ Entry-level licensees should be granted (restricted) HF rights from the beginning, in more than one amateur band. A power limit is but one possible restriction that could be imposed. If the Technician level is kept as the entry-level license, higher power limits should be granted (say 100 Watt or 200 Watt) since Element 2 examinations already require a basic understanding of RF safety issues and procedures.